

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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MEMO ENDORSED

David E. Patton
Executive Director
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Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

December 5, 2022

VIA EMAIL AND ECF

The Honorable Kenneth M. Karas
United States District Court Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: United States v. Daniel Delgado, 7:22-cr-389-KMK-1

Dear Honorable Judge Karas:

I write to request an adjournment for the above captioned matter, which is currently scheduled for a status conference on Friday, December 9, 2022, at 12:00 p.m.

The parties are in on-going plea negotiations. Although we are close to resolving a few outstanding questions, I do not anticipate having those discussions completed in time for Mr. Delgado to plead guilty on Friday. In addition, my father-in-law passed away over the weekend. I need to travel out of town this week to attend the funeral on Saturday and will not be available to attend Friday's conference or have time to fully discuss the plea with Mr. Delgado before then. Given the holidays, I would request a date toward the beginning of January for a plea/status conference.

I have discussed this request with the government through Assistant United States Attorney Michael Maimin. He has no objection to this request so long as time is excluded under the Speedy Trial Act. Mr. Delgado does not oppose the exclusion of time. Therefore, Mr. Delgado respectfully requests the Court adjourn his conference to early January.

Thank you for your time and consideration.

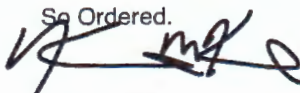
Granted. The conference is adjourned until 1/5/23, at 12:30. Time is excluded until then, in the interests of justice, to allow the Parties to complete their discussions toward a disposition. Also, the Court passes along condolences to Ms. Quinn.

Respectfully submitted,



Elizabeth K. Quinn
Attorney for Mr. Delgado

So Ordered.



12/5/22

cc: Michael Maimin, A.U.S.A. (via email)